



THORNTON O'CONNOR  
TOWN PLANNING

# Development Plan Submission

Submission In Respect of The *Draft Kildare County Development Plan 2023 – 2029*

Relating to Lands Proposed to be Zoned Residential South of Ballymore Eustace Village

Submitted on Behalf of 1 Liffey Heights Limited, a SPV of Lioncor

May 2022

Kildare County Council  
Forward Planning Department  
Áras Chill Dara  
Devoy Park  
Naas  
Co. Kildare

Wednesday, 18<sup>th</sup> May 2022

Dear Sir/Madam

**Re: Submission on the Draft Kildare County Development Plan 2023-2029**  
**in respect of a**  
**Proposal to zone Lands at Ballymore Eustace for Residential Use ('C-New Residential')**

## **1.0 INTRODUCTION – WE SUBMIT THAT THE SUBJECT SITE BE ZONED 'C-NEW RESIDENTIAL' IN THE KILDARE COUNTY DEVELOPMENT PLAN 2023-2029**

Thornton O'Connor Town Planning has been retained by Lioncor, acting on behalf of the Landowner *I Liffey Heights Limited*<sup>1</sup> to prepare this Submission in respect of the *Draft Kildare County Development Plan 2023-2029*.

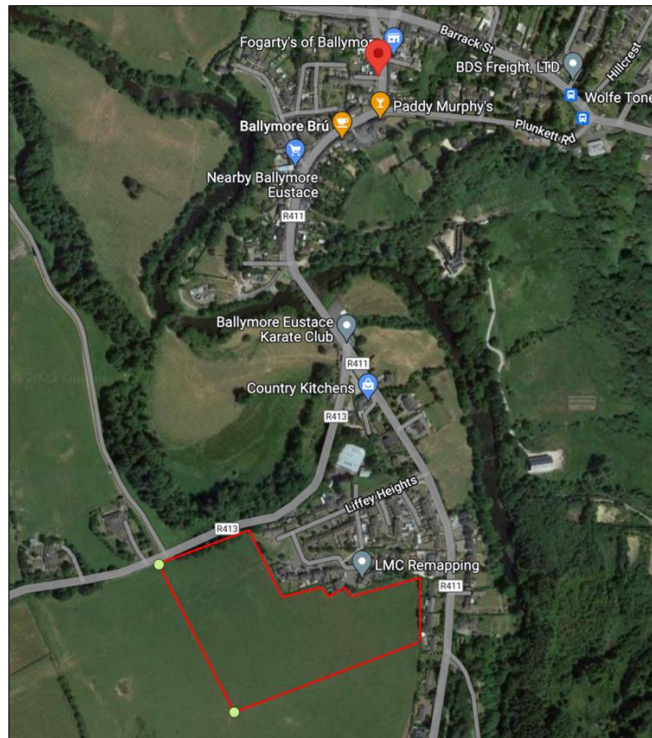
This Submission specifically relates to a site in Ballymore Eustace that was previously zoned for residential development but was 'dezoned' in the *2017 -2023 Development Plan*. We submit that this site should revert to its former residential zoning status in the forthcoming Development Plan (2023-2029) for the reasons and considerations detailed in this submission.

The site was 'dezoned' at the Material Amendments stage of the preparation of the last Development Plan. It was removed in favour of a site to the north of the village (see Section 2.0 of this Report). The Council considered, at the time, that the northern site was more appropriate in terms of the sequential growth of the village. Planning permission has since been granted for 91 No. of units on the northern site, and this development is under construction. The only other site currently zoned for new residential development in the village is also under construction (lands immediately to the west of the village core). Following completion of these two developments, there will be no remaining land zoned in Ballymore Eustace to accommodate new residential development.

It is therefore considered that now is the time for the subject site to revert to its former residential zoning, to ensure a ready supply of much needed housing in Ballymore Eustace.

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<sup>1</sup> An SPV of Lioncor



**Figure 1: Site Location outlined Indicatively in Red**

**(Source: Google Maps annotated by Thornton O'Connor Town Planning)**

Safety concerns have been raised in the past regarding development south of the river at Ballymore Eustace. This is due to the absence of a dedicated pedestrian or cycle path at Ballymore Bridge. These concerns are valid but can easily be remedied by the construction of a shared pedestrian/cycle boardwalk affixed to the existing bridge. Lioncor has discussed this with the Roads Department of Kildare County Council as detailed further in this submission and it has been agreed as a viable option for the future development of the subject lands.

In this regard, development on the subject site could be tied to the delivery of this bridge by a Specific Local Objective (SLO) in association with a residential zoning, worded as follows for example:

*Development on this site shall proceed in tandem with the delivery of suitable infrastructure which will enable pedestrians and cyclists to safely cross Ballymore Bridge to reach the Village Centre.*

It is accepted that the Developer would provide this new pedestrian and cycle infrastructure as part of any development on the subject site in line with a SLO objective if deemed necessary and appropriate by the Planning Authority.

We submit that the zoning map in the forthcoming Development Plan should be updated to identify the subject site by zoning objective 'C-New Residential', restoring the previous residential zoning to the site. We further recommend that a SLO be applied to the site as per the wording proposed above.

This submission includes the following enclosures, which include details of the site characteristics, utilities and services, roads and an indicative, outline masterplan for the site, all demonstrating the suitability of the site for development:

- Architectural Booklet, including Boardwalk proposals, prepared by JFOC Architects
- Engineering Report, prepared by Donnachadh O'Brien and Associates Consulting Engineers

## 2.0 EXECUTIVE SUMMARY

The subject lands are the next logical site for new residential development in Ballymore Eustace. The site is in single ownership, by 1 Liffey Heights Limited, an SPV of Lioncor. Lioncor is a well-established Irish property development company, with a proven record of delivering high quality housing nationwide. This is therefore not a speculative submission. Subject to an appropriate zoning designation for the site, a planning application would be immediately forthcoming on this site, with a view to delivering houses on the site at the earliest opportunity.

The site was previously zoned in the *Kildare County Development Plan 2011-2017* for new residential development ('C-New Residential'). The site was then 'dezoned' at the Material Amendments stage of preparation of the 2017-2023 Development Plan in favour of a site to the north of the village.

The Draft Development Plan (2023-2029) includes 2 No. sites in Ballymore Eustace zoned 'C-New Residential'. Planning permission exists on both of these sites, and development is underway on both sites. In fact, houses are available for sale at the 'Tinnycross Park' development, to the north of the village. Given that both sites are already under development, it is submitted that they should be rezoned 'B-Existing/ Infill Residential' in the upcoming Plan, as these houses are being delivered within the *2017-2023 Development Plan* cycle. There are no other sites zoned for new residential development in Ballymore Eustace.

It is therefore submitted that the subject site should revert to its former 'C-New Residential' zoning. The site represents the next logical step for a compact residential development in Ballymore Eustace. Spatially, development on this site would counteract the current imbalance of development to the north of the village. It would assist in refocusing attention on the village's most important asset – the River Liffey, and its crossing at Ballymore Bridge.

A planning application was made in 2017 for 79 No. houses on the subject site. This followed extensive pre application consultation with Kildare County Council. The application was refused permission and then appealed to An Bord Pleanála. The Board ultimately refused permission for a single reason. This related to the lack of safe pedestrian and cycle access across Ballymore Bridge into the village. All other concerns had been addressed prior to determination of the application.

Our client recognises the validity of this concern, and therefore has investigated potential solutions for creating a safe pedestrian and cycle route at this location. It is proposed that a shared pedestrian and cycle boardwalk be attached to the existing bridge structure, as shown in the accompanying documents prepared by JFOC Architects and Donnachadh O'Brien and Associates Consulting Engineers. This is a feasible solution that would address the outstanding concerns relating to a development south of the river.

We propose that this boardwalk be provided by the developer, as part of, or in tandem with development on the subject site. Delivery can be secured by way of a Specific Local Objective (SLO) applied to this site. We have provided suggested wording in this submission of such an SLO.

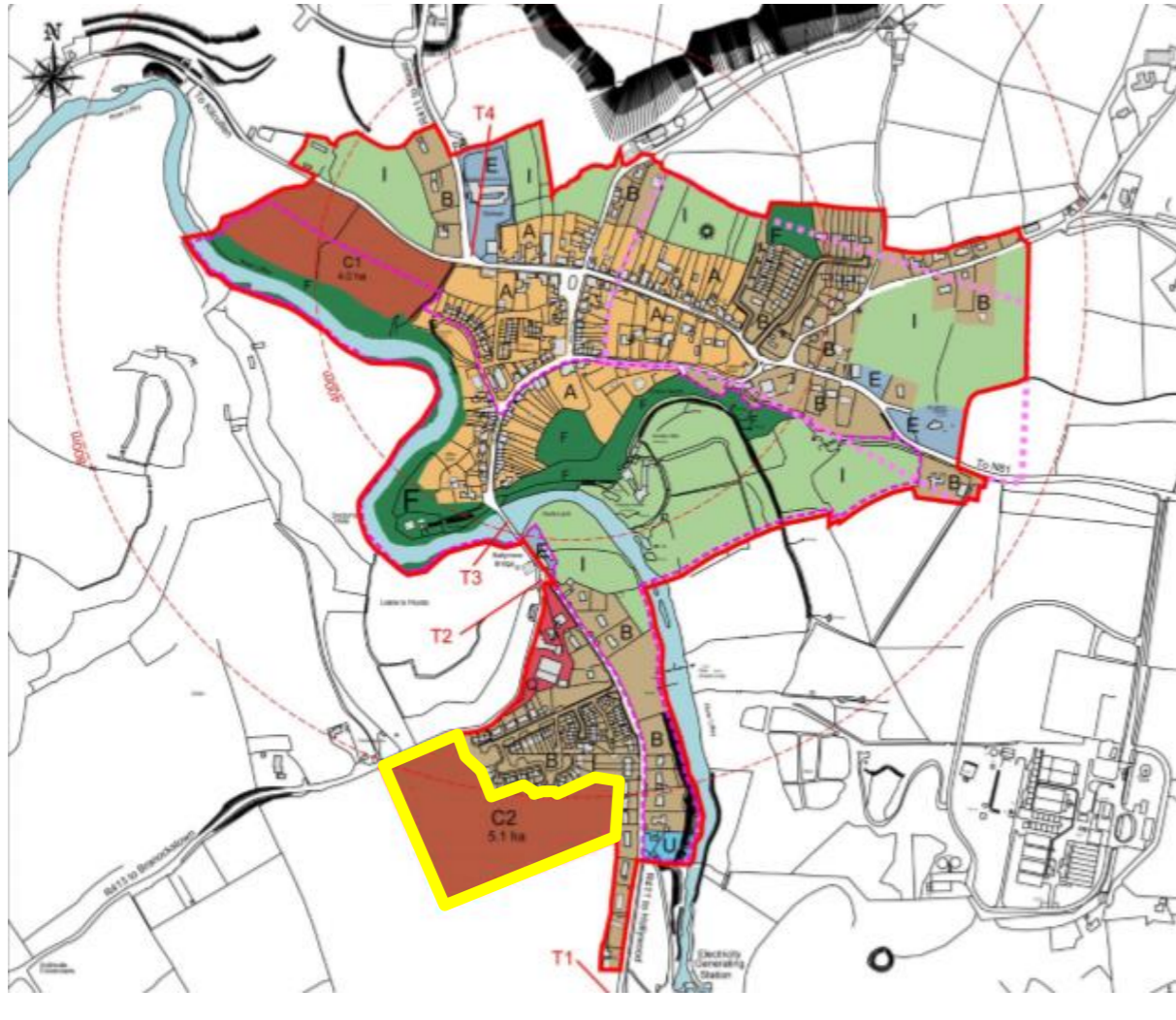
The residential zoning of this site is supporting by national and regional planning policy, including the *National Planning Framework*, the *Regional Spatial and Economic Strategy for the Eastern and Midland Region*, and *Rebuilding Ireland: An Action Plan for Housing and Homelessness*. The subject site has the potential to deliver a compact, residential development at a sustainable location, thereby providing an alternative to one-off rural dwellings. It also fully serviced and so is effectively a 'shovel ready', or 'Tier 1' site that can deliver much needed homes in County Kildare in the relative short term. This should be facilitated, given the severe housing shortage that continues to plague the Greater Dublin Area. Housing completions in the County and Nationwide are still far below what is required to meet the housing demand.

For these reasons, we submit that the subject site should revert to its former 'C-New Residential' zoning in the *2023-2029 Development Plan*.

3.0 ZONING CHANGE THAT APPEARED AT THE MATERIAL AMENDMENTS STAGE OF THE 2017-2023 DEVELOPMENT PLAN

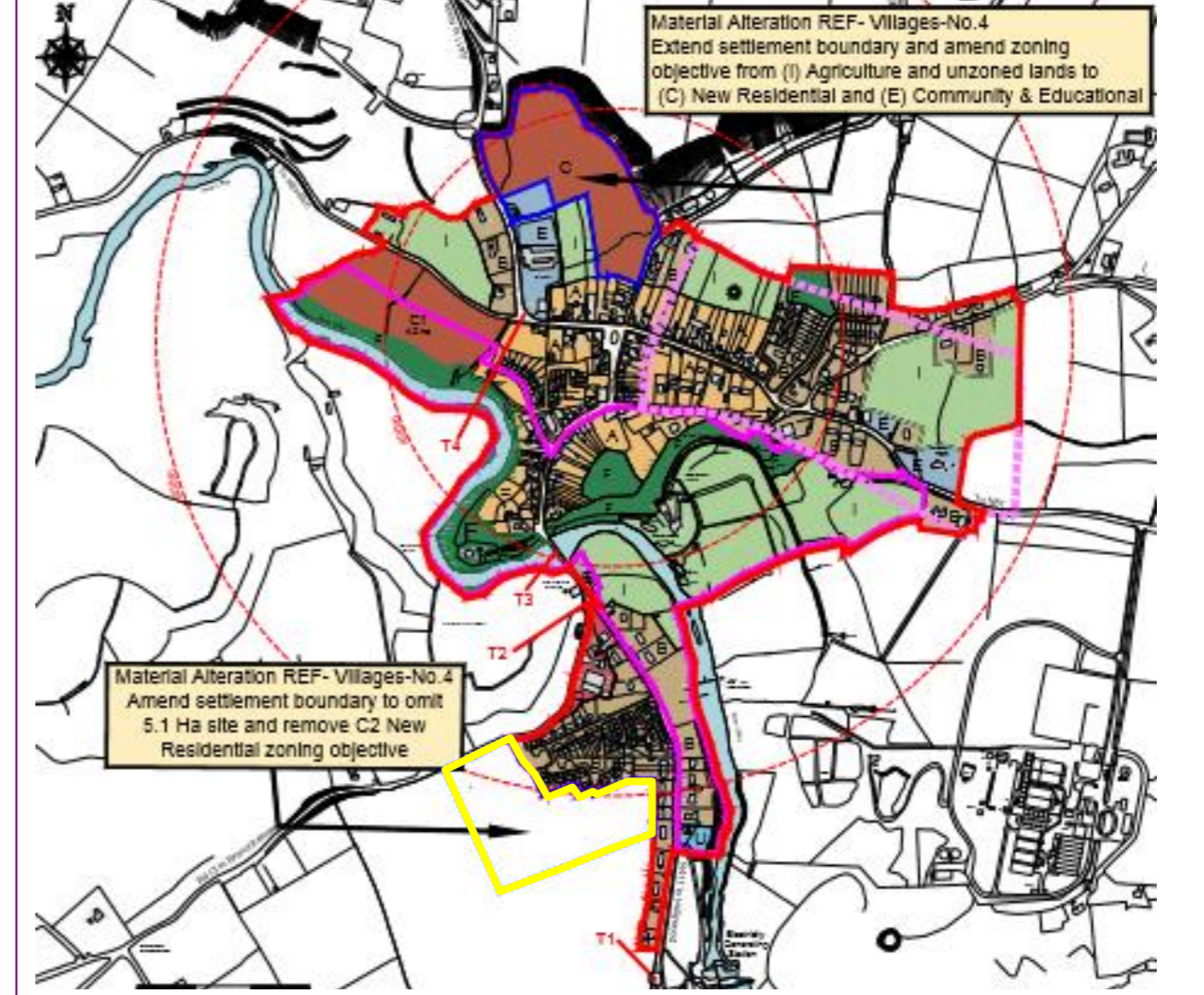
Draft Plan/Pre Material Stage:

Draft Plan Reflects Residential Zoning Pertaining to Site (subject lands highlighted in yellow).



Adopted 2017-2023 Plan:

Material Alteration to 'Dezone' Subject Lands and Zone Lands to North (subject lands highlighted in yellow).



4.0 LIONCOR

Our client, Lioncor is a well-established, Irish residential property development company. Lioncor has a proven track record in the delivery of high quality, new homes nationwide. Examples of recent completed developments include The Edge, at Castlebrook Manor, Castletroy, Co. Limerick and The Nurseries, Dundrum, Dublin 14. Other developments nearing completion include Kilruddery Glen, Bray, Co. Wicklow and Richmond Rise, Sallybrook, Cork.

Lioncor is committed to delivery and so it established a construction arm - Lioncor Construction - in 2020 to support its ambition. Our client is in ownership of the entire site. This rezoning submission is therefore about facilitating the delivery of new homes rather than a speculative submission and a planning application for development will proceed immediately if the lands residential zoning is restored.

5.0 SITE DESCRIPTION

The subject site is located on the southern fringe of Ballymore Eustace, to the west of the River Liffey in the townlands of Ballymore Eustace West and Broadleas Common. The subject lands are bounded to the east by the R411 (Hollywood Road) and to the north by the R413 (Brannockstown Road). The site is greenfield and is currently in use as pasture grassland and is bordered by hedgerows and other agricultural lands to the south and west. Immediately to the east lies the Liffey Heights housing estate. The site rises gently in a slope from north to south.

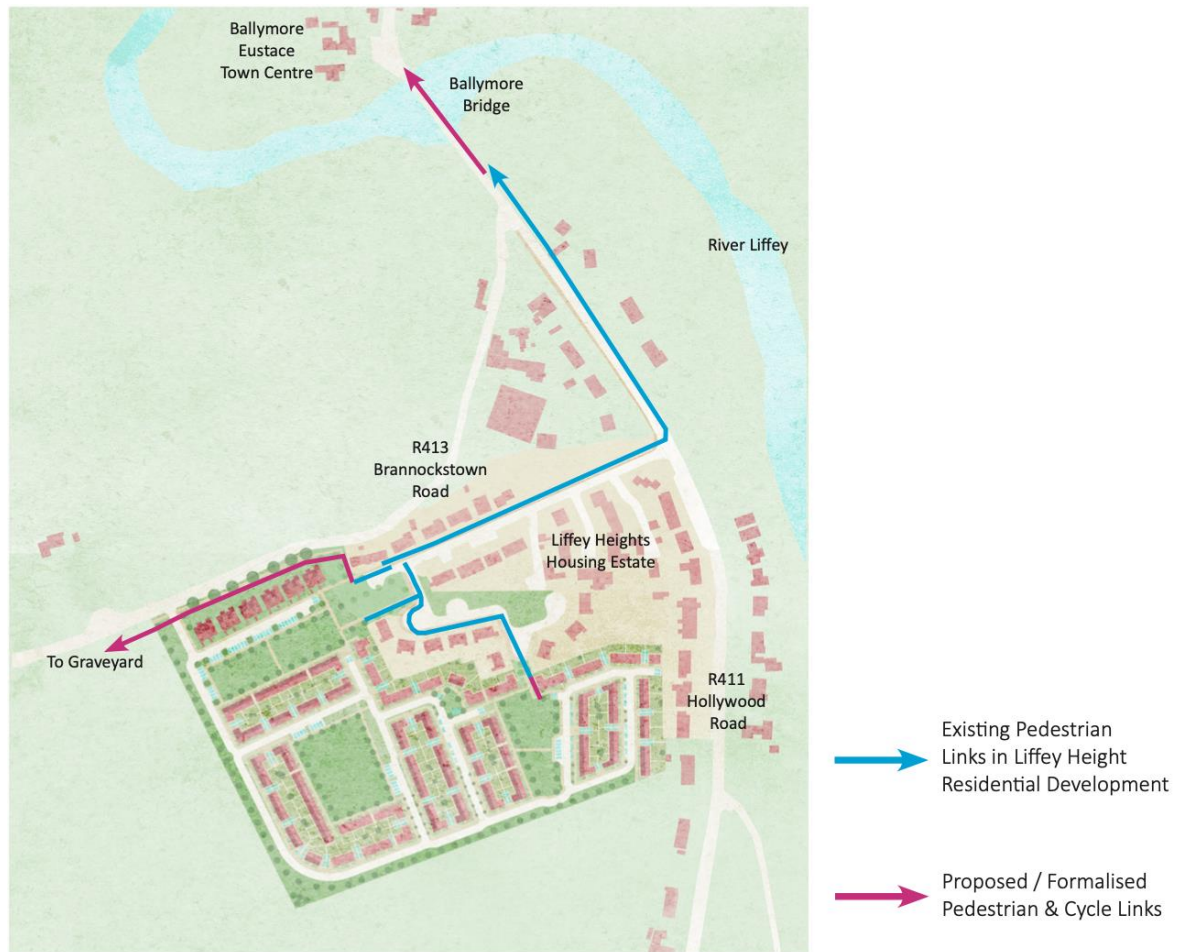
The Kildare County Council Strategic Flood Risk Assessment confirms that the site is *not* at risk of flooding from the nearby River Liffey. Nevertheless, it is relatively low lying and therefore development on this site is highly unlikely to result in any negative streetscape or visual impacts. For reference, the new developments on the northside of the village are approximately 5-8 No. metres higher than the subject site.



Figure 2: View of Subject lands from R413 at northern site boundary

(Source: Google Maps Street View dated October 2021)

The site is well connected to the village, and future residents would be able to avail of the existing pedestrian links through Liffey Heights estate, as shown in the diagram below:



**Figure 3: Diagram showing pedestrian links to and from site assuming development of the Subject Site**

**(Source: JFOC Architects Brochure – enclosed)**

As noted earlier in this submission, any development on this site would be accompanied by new pedestrian/ cycle facilities at Ballymore Bridge. Future residents would therefore be able to access the village’s services and bus connections on foot or by bicycle, in line with sustainable mobility principles.

**Key Point:** The subject site is located on the southern fringe of the village, and benefits from good pedestrian connectivity to the village centre. This will be enhanced by the delivery of the proposed pedestrian/ cycle boardwalk at Ballymore Bridge, proposed as part of this submission. The site is not at risk of flooding and benefits from a favourable topography, in that streetscape or visual impacts are unlikely to be a problem for a development on this site.



## 6.0 PLANNING HISTORY OF THE SUBJECT SITE

As highlighted above, the subject site was - in the *Kildare County Development Plan 2011-2017* - zoned for residential development and thus deemed an appropriate residential site. During 2016, Thornton O'Connor Town Planning, on behalf of the Applicant, led pre planning discussions with Kildare County Council relating to an application for 79 No. houses on this site. Feedback from the Planning Officers was supportive. Shortly thereafter and just prior to the lodgement of that application, Kildare County Council published the proposed Material Amendments to the *Draft Development Plan 2017-2023*. The Material Amendments proposed removal of the residential zoning of the subject lands.

Shortly thereafter, a planning application was made to Kildare County Council for housing on the subject site (Reg. Ref. 17/204). Following legal action by the Applicant, a High Court Order directed that the zoning of the site in the new Development Plan be stayed until determination of a judicial review. This enabled the planning application (Reg. Ref. 17/204) to be determined as though the zoning status of the lands had not changed.



**Figure 4: Site Layout of Reg. Ref. 17/204**

**(Source: Kildare County Council Planning Application Reg. Ref. 17/204)**

The planning application was refused by Kildare County Council on 20<sup>th</sup> April 2017. Two reasons for refusal were given. Firstly, it was deemed that the development would be premature pending a new footway and cycle crossing over the River Liffey at Ballymore Bridge. The second reason was on the advice of Irish Water and related specifically to the development layout and its proximity to a trunk watermain.

The Applicant subsequently appealed this decision. An Bord Pleanála rejected the reason relating to proximity to a watermain as the evidence provided by Irish Water to support this was lacking. However, the Board ultimately refused permission due to the absence of a safe pedestrian and cycle route across the River Liffey. This was the sole reason for refusal and can be satisfactorily addressed by the Applicant in a future application subject to the appropriate residential zoning be restored to the lands.

It is reiterated that Irish Water’s objection related to the development layout in the 2017 application, and not against the principle of the site accommodating a residential development.

**Key Point:** Planning Permission was refused on the subject site for one reason. This related to the existing, pedestrian and cycle access across Ballymore Bridge being deemed as inadequate and unsafe. This matter can be satisfactorily addressed by the construction of a boardwalk, as detailed in this submission. No other planning issues remain with respect to the principle of a residential development on this site.

## 7.0 PROPOSED BOARDWALK AT BALLYMORE BRIDGE

In recognition of the reason for this refusal of permission, Lioncor has explored potential solutions to providing safe pedestrian and cycle access across the River Liffey at this location. It should be noted that save for at the river crossing, there is a dedicated, uninterrupted footpath from the subject site to the village centre, via Liffey Heights estate as detailed above.

It is proposed that the Developer would construct, in consultation with Kildare County Council, a cantilevered boardwalk attached to the existing bridge structure. This would be for a combined pedestrian and cycle use and would tie in with the existing footpaths on either side of the bridge. This approach has been discussed with the Roads Department of Kildare County Council and they consider the proposal as a viable option to improve pedestrian and cycle infrastructure in the village. We refer the Council to the enclosed reports prepared by JFOC Architects and Donnachadh O’Brien and Associates Consulting Engineers, which provide more detail on these proposals, as well as confirming the technical feasibility of such an approach.



**Figure 5: Proposed Boardwalk at Ballymore Bridge**

**(Source: JFOC Architects Brochure - enclosed)**

This type of intervention is common and there are many examples across the country where similar improvements have been successfully applied. The new crossing of the River Slaney in Tullow, Co. Carlow is such an example (see Figure 6 below).



**Figure 6: Boardwalk in Tullow, Co. Carlow**

**(Source: DOB Consulting Engineers Report - enclosed)**

The proposed boardwalk that could be delivered in tandem with development of the subject site would be of significant benefit to the entire village, particularly the existing residents south of the river. Its construction would also enable residential development at the subject site, as it would address the only remaining reason for the rejection of the previous planning application at the subject site.

**Key Point:** It is proposed that a boardwalk structure be attached to the existing bridge to cater for pedestrian and cycle access. This is a feasible and well tested solution that can be delivered by the developer. This will resolve the concerns relating to development south of the river in Ballymore Eustace.

## 8.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

The conversion of the subject site to a residential zoning ('C- New Residential') is supported in principle by both the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region. This is discussed in greater detail below.

### 8.1 Rebuilding Ireland – an Action Plan for Housing and Homelessness

'*Rebuilding Ireland – an Action Plan for Housing and Homelessness*' was published in 2016 and sets out the Government's plan to resolve the Housing Crisis. This is principally to be achieved by increasing housing output generally towards the target of producing 25,000 No. houses per year through all channels and providing 47,000 No. new social houses.

In 2016, housing completions nationally had begun to gradually increase from their exceptionally low levels of output during the global recession. This momentum increased until the pandemic saw the closure of all construction sites across the country over extended periods. While recovery has

now begun, housing completions are still well below required levels to address current demand, as well as the extraordinarily high levels of pent-up demand.

The implementation of the 'Rebuilding Ireland' plan therefore is still very much a work in progress. Much more needs to be done to increase the supply of housing in Kildare and nationwide. A previous planning application for housing on the subject site has determined that housing can be delivered once safe access is provided to the village and in this regard, our Client has developed an entirely viable solution to address this matter. They are therefore in a position to deliver much needed housing in this sustainable location in a timely manner. This is, of course, subject to a change in the zoning objective applying to the site, as outlined above.

**Key Point:** Although this Action Plan was published over five year ago, housing delivery is still significantly below what is required to address the housing and homelessness crisis. A sustainable, compact development is demonstrably deliverable at this site in the relatively near future. This would contribute much needed housing and assist with supply in Co. Kildare.

## 8.2 National Planning Framework

Strategic Outcome 1 of the National Planning Framework (NPF) relates to compact growth. The subject site provides the opportunity for planned, compact growth within the village of Ballymore Eustace, in place of alternative piecemeal or ribbon forms of development. The subject site is within walking distance of all the services the village has to offer. The village is already served by Dublin Bus route No. 65, which connects residents to all the services and amenities of Blessington, Tallaght and Dublin City Centre by means of sustainable transport. The NPF seeks to:

*'Ensure transition to more sustainable modes of travel (walking, cycling, public transport) and energy consumption (efficiency, renewables) within smaller towns and villages and rural areas'.*

The construction of the proposed pedestrian/ cycle boardwalk will make a valuable contribution to the village's sustainable transport infrastructure. The proposed rezoning is also supported by the following National Policy Objectives, as development on this site would represent investment and regeneration in this village. The proposed boardwalk would also be a significant investment in the village's public realm and infrastructure.

### National Policy Objective 6

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

### National Policy Objective 18a

To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

The NPF advocates a tiered approach to zoning to differentiate between land that is serviced, and land that is capable of becoming serviced within the lifetime of the Plan (National Policy Objective 72a). Sites that are not capable of becoming serviced during the lifetime of a Plan should not be zoned for residential development. This site *can* readily be considered as serviced, and therefore a 'Tier 1' site. We refer the Planning Authority to the enclosed Engineering Report prepared by Donnachadh O'Brien and Associates Consulting Engineers. This report provides details of the drainage and other infrastructure that is readily available to the site.

The one potential deficit in infrastructure is the safe pedestrian/ cycle link across the river. However, this can be delivered in tandem with any development, at the expense of the developer. The proposed SLO wording above would be a means of securing this in the Plan, along with the provision of much needed homes on the subject site. The subject site should therefore be considered as a 'Tier 1' site for residential development.

**Key Point:** Development at the subject site would represent compact, sustainable residential development, which is a central objective of the NPF. It would represent investment in an existing village community. It would also facilitate the delivery of much-needed pedestrian/ cycle infrastructure at Ballymore Bridge, which would benefit existing residents, as well as future ones. The site is serviced, and should thus be considered a "Tier 1" site.

### 8.3 Regional Spatial and Economic Strategy for the Eastern and Midlands Region

A compact residential development on the subject site would also align with the priorities of the Regional Spatial and Economic Strategic (RSES). The RSES states the following about housing in villages:

*'Facilitating housing is paramount to ensuring the sustainability, vitality and viability of the rural places of the Region. Support for housing and population growth within rural towns and villages **will help to act as a viable alternative to rural one-off housing, contributing to the principle of compact growth. The availability of serviced sites, in tandem with schemes such as the Irish Water Scheme for Small Towns and Villages, will help this**'.*

[Our Emphasis added]

The RSES also recognises that increasing the supply of housing is urgently needed in this region if we are to address the ongoing housing affordability crisis. The subject site is serviced and in single ownership by a developer with a proven track record and access to finance. It is therefore effectively 'shovel ready'.

*There is a need now for **accelerated delivery of housing**, particularly in Dublin and in identified growth settlements in the Region to ensure the development of **high quality and affordable homes located within sustainable communities** in order to meet the existing and future needs of a growing population.*

[Our Emphasis added]

**Key Point:** Development at the subject site would support the vitality of the village of Ballymore Eustace. It would accelerate the delivery of housing and provide a more sustainable alternative to rural one-off housing in County Kildare, in line with the RSES.

## 9.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

The Draft Plan includes the following objectives specifically related to Ballymore Eustace:

*V BE16: Develop and improve pedestrian and cycling facilities to and from the village centre*

*V BE19: Widen and improve Ballymore Bridge and specifically improve pedestrian facilities along this route*

These objectives would be achieved through the development of the subject site, as any development of the subject site would include delivery of new pedestrian/ cycle infrastructure at Ballymore Bridge. This could be secured in the Development Plan by means of a SLO in tandem with development of the subject site, as outlined above.

**Key Point:** The rezoning of this site would facilitate the construction of a pedestrian link across the river, thereby delivering Council Objectives V BE16 and V BE19.

### 9.1 Core Strategy

The *Draft Core and Settlement Strategy* sets out an overall growth strategy for the county until 2029. It targets the delivery of 9,144 No. new homes in the county during the lifetime of the upcoming Plan. Ballymore Eustace is designated as a 'village' in the *Draft Core and Settlement Strategy*. While not designated to accommodate significant growth, compact residential growth in smaller settlements is recognised as a means of avoiding the proliferation of one-off, urban generated, rural dwellings. The subject site represents a logical, sequential expansion of the village.

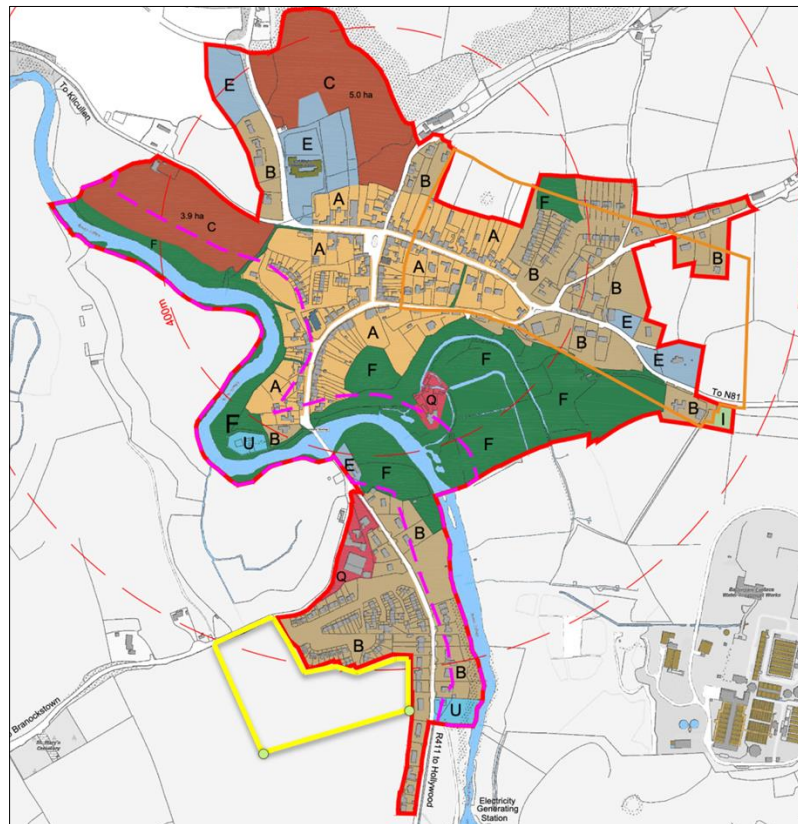
Due to the Covid-19 pandemic, the scheduled 2021 census was postponed until 2022. As a result, the Draft Core Strategy was based on 2016 census data. While this was unavoidable, the 2016 census cannot represent the full extent of population growth which has occurred in Kildare during the intercensal period. Nor does it capture the acute shortage of new housing completions, exacerbated by the periods of construction industry shut down during the pandemic. It is submitted therefore that the Draft Core Strategy most probably underestimates the number of new homes that are needed in Kildare up to 2029. Development on serviced sites, in sustainable locations such as this, should be facilitated through appropriate zoning designations.

**Key Point:** The rezoning of this site would contribute to the Core Strategy's target of delivering 9,144 homes within the Plan period. Housing delivery has been well below required levels for many years, leading to the current acute housing shortage. A shovel ready site such as this should be facilitated if there is any hope in achieving the required levels of housing delivery anticipated in the Core Strategy.

## 10.0 BALANCED SPATIAL DEVELOPMENT

Two sites make up the entirety of the land zoned for new residential development in Ballymore Eustace. Both are north of the river, and construction is underway on both sites. These are the Tinnycross Park development (Reg Ref 19/750) and the River Walk development (Reg Ref 18/1347). This has led to a somewhat unbalanced spatial form of development in Ballymore Eustace, with most of the activity concentrated on the northern side of the village. This potentially gives rise to a risk of relative congestion on the northside of the river.

The subject site presents the opportunity to rebalance the spatial form of the town to a more organic pattern of development. The new proposed boardwalk will bring pedestrian activity to the river crossing, thus re-emphasising the village’s most unique asset - the River Liffey.



**Figure 7:** Subject site outlined in yellow, demonstrating that it would restore a more spatially balanced form of development to Ballymore Eustace.

**Source:** Draft Kildare County Development Plan 2023-2029, annotated by Thornton O’Connor Town Planning

Arguably, as both of the proposed ‘C-New Residential’ sites are already under development, they would be more appropriately identified as zoning objective ‘B-Existing/ Infill Residential’ in the 2023-2029 *Development Plan*. The housing being built on these sites will be delivered before the upcoming Development Plan cycle begins. The subject site is therefore the most logical location for the next stage of new residential development in Ballymore Eustace.

**Key Point:** There are only 2 No. sites zoned ‘C-New Residential’ in Ballymore Eustace in the Draft Plan. Development is under construction on both sites, therefore there are in fact, no sites in Ballymore Eustace to facilitate new residential development in the upcoming Development Plan cycle. The subject site represents a logical next step for development in village and would rebalance development within the town to the south. It should therefore be restored to its former ‘C-New Residential’ zoning status.

## 11.0 VISUAL IMPACT AND PROTECTION OF HISTORIC STREETScape

Ballymore Eustace developed with a mill in the early 19<sup>th</sup> Century with many of the houses dating from that period. Therefore, Ballymore Eustace has a unique character derived from traditional building forms and streetscape. The Draft Plan states that it is important that the scale and form of new developments in the village respect the historic streetscape.

The location and topography of the subject site is such that it is capable of accommodating a compact, residential development, without impacting on the unique, historic streetscape of Ballymore Eustace. This has already been determined by An Bord Pleanála, who in refusing permission in relation to a residential scheme only cited a reason relating to connectivity to the Village. This will be resolved via a SLO on the subject lands as detailed.

## 12.0 OUTLINE MASTERPLAN FOR THE SITE

We refer the Planning Authority to the enclosed report prepared by JFOC Architects. This includes an indicative masterplan, based on an analysis of the site. The purpose of this outline masterplan is to share our client's vision with the Planning Authority of how the site could be sensitively developed.



**Figure 8: Indicative Masterplan for the Subject Site**

**(Source: JFOC Architects Brochure – enclosed)**

This outline masterplan includes proposed new links through and connecting to the site, as well as public open spaces. CGIs are also provided to aid visualization of a potential scheme on this site:





**Figure 9: CGI to Aid Interpretation of the Indicative Masterplan**  
**(Source: JFOC Architects Brochure - enclosed)**

### 13.0 CONCLUSION

To conclude, we submit that the subject site should revert to zoning objective 'C-New Residential', as it was prior to being dezoned in the *2017-2023 Development Plan*. Furthermore, in recognition of the need for improved pedestrian and cycle access from the site to the village core, we recommend the following Specific Local Objective (SLO) (or similar wording) is applied to these lands:

*Development on this site shall proceed following, or in tandem with, the delivery of suitable infrastructure which will enable pedestrians and cyclists to safely cross Ballymore Bridge to reach the Village Centre.*

The subject site is capable of delivering a compact, sustainable residential development within the village of Ballymore Eustace immediately. A development of this nature is supported by the NPF and RSES, as it provides a more sustainable alternative to one-off rural dwellings. Furthermore, it would contribute to the vitality and infrastructure of an existing village.

The Draft Plan currently includes 2 No. sites in Ballymore Eustace zoned as 'C-New Residential'. Planning permission exists on both of these sites, and development is underway. The *2023-2029 Development Plan* zoning should reflect these sites as 'B -Existing/ Infill Residential', as these sites will have already been completed. This will leave no sites in Ballymore Eustace zoned for new residential development within the upcoming Development Plan cycle. We submit that the subject site should be zoned to accommodate new residential development as it entails the next logical step in the spatial development of the village.

As the housing crisis persists, it is essential that housing completions dramatically increase from current levels. This is a serviced site, in single ownership by a renowned developer with the capacity to build homes here in the near future. It has all the characteristics of a 'Tier 1' site. Our Client is committed to investing in Ballymore Eustace evidenced by the work in developing a viable solution to facilitate access from the site and the southern part of the Village to the Village Centre, and we submit that the emerging Development Plan should facilitate this and provide balanced spatial development in Ballymore Eustace

Aside from the new homes, this would enable the delivery of a high quality, safe pedestrian and cycle path connecting the southside of Ballymore Eustace to the village centre. This would serve existing, as well as future residents.

Should you require any further information relating to the above, please do not hesitate to contact the undersigned.

Your Sincerely



**Patricia Thornton**  
**Director**  
**Thornton O'Connor Town Planning**

Enclosures:

- Architectural Booklet, including Boardwalk proposals, prepared by JFOC Architects
- Engineering Report, prepared by Donnachadh O'Brien and Associates Consulting Engineers

